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*Attorneys for Plaintiffs and Putative Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

LD, DB, BW, RH AND CJ on behalf of themselves and all others similarly situated,

**Plaintiffs,**

VS.

UNITEDHEALTHCARE INSURANCE COMPANY, a Connecticut Corporation,  
UNITED BEHAVIORAL HEALTH, a California Corporation, and  
MULTIPLAN, INC., a New York Corporation

### Defendants.

Case No.: 4:20-cv-02254-YGR

**DECLARATION OF DAVID M.  
LILIENSTEIN IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE MATERIAL  
DESIGNATED AS CONFIDENTIAL  
UNDER SEAL [REPLY BRIEF]**

1 I, David M. Lilienstein, an attorney, declare under penalty of perjury, that the following is true  
2 and correct, based on my personal knowledge:

3 1. I am an attorney at law duly licensed to practice before all courts in the State of  
4 California, including this District Court. I am founder and owner of the DL Law Group, one  
5 counsel of record for Plaintiffs in the instant action.

6 2. The entirety of Exhibit A to the Declaration of David M. Lilienstein in Support of  
7 Plaintiffs' Reply in Support of Plaintiffs' Motion for Adjudication Establishing the Standard of  
8 Review as *De Novo* ("Lilienstein Declaration") has been designated by Defendant United  
9 HealthCare Insurance Company as "CONFIDENTIAL".

10 3. Exhibit A to Lilienstein Declaration also contains personal health information of  
11 the Plaintiffs.

12 4. Plaintiffs' administrative motion seeks to seal only those exhibits—as well as  
13 those portions of Plaintiffs' reply standard of review motion that refer to the designated  
14 information—that are either designated as "CONFIDENTIAL," "CONFIDENTIAL –  
15 ATTORNEY'S EYES ONLY" or that contain parties' private health information.  
16

17 5. Plaintiffs' administrative motion also seeks to seal portions of Plaintiffs' reply  
18 brief that reference exhibits Plaintiffs have previously moved to file under seal (Dkt. 97).

19 6. Plaintiffs are concurrently filing a public redacted version of Plaintiffs' Reply  
20 Brief in Support of Plaintiffs' Motion for Adjudication Establishing the Standard of Review as  
21 *de novo*.

22 7. In connection with Plaintiff's Administrative Motion to File Material Designated  
23 as Confidential Under Seal, the parties stipulated, and this court so ordered, that documents  
24

1 designated as “CONFIDENTIAL,” “CONFIDENTIAL—ATTORNEY’S EYES ONLY” and  
2 documents containing parties’ private health information may be sealed. (Dkt. 25).  
3  
4  
5

6 I declare under the penalty of perjury under the laws of the State of California and these  
7 United States that the foregoing is true and correct.  
8

9 /s/ David M. Lilienstein  
10 David M. Lilienstein, Esq.